



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 02 2002

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Don Williams, Plant Environmental Coordinator
Grenada Manufacturing, LLC
635 Highway 332
Grenada, Mississippi 38901

Subject: Comments on Closure Plan for the former Chrome Plating Area
Grenada Manufacturing, LLC
EPA ID No. MSD 007 037 278

Dear Mr. Williams;

The Environmental Protection Agency (EPA) has received and reviewed your revised Closure Plan for the Chrome Plating Area, dated September 2002. This document is deficient and needs extensive revision before it will be acceptable in its final form. It is strongly recommended that the next iteration of the closure plan contain remedial alternatives to mitigate the impact of the Chromium +6 laden soil on the groundwater. EPA is hereby issuing an official Notice of Technical Inadequacy (NOTI) for this document. Grenada's revised Closure plan will be due one hundred and twenty (120) days after receipt of this letter.

It is Region 4's policy to use the most conservative risk based screening concentrations for pathway-specific values for soils under industrial land-use scenarios. Region 4 recommends the use of the Region 9 Preliminary Remediation Goals (PRG) as guidance for screening purposes rather than the Region 3 Risk Based Concentrations (RBC). The Region 9 table can be found on the Web at: <http://www.epa.gov/region09/waste/sfund/prg/>.

Please note that PRGs are not intended to be remediation levels. In this case, cleanup goals can be based upon Best Practicable Technology limitations. PRGs help to ensure that (1) proposed analytical methods will have adequate quantitation limits; (2) the site will be adequately characterized; and (3) the remedial alternatives can achieve the target cleanup levels agreed upon between the facility and the agency.

The Closure Plan for the Chrome Plating Area, dated September 2002, itself demonstrates the need for a remedial action plan. The Sampling Assessment of the former Chrome Plating Line Area conducted in July 2002 showed 10 exceedances of PRGs out of 27 samples collected from the surface to a depth of 16 to 20 feet. At least two of these samples, SS-3 bottom and PL-2 bottom exceed PRGs by more than an order of magnitude and are below the groundwater table. The groundwater table is known to be shallow at the Grenada site, 12 to 15 feet normally, less in times of heavy rain. Thirteen of the samples show exceedances of the DAF1 (Dilution Attenuation Factor) for migration of soil contaminants to groundwater. And, the facility in its quarterly monitoring of MW-23, directly down gradient of the former Chrome Plating Line Area detected Total Chromium at 10 times the MCL as recently as April 2002. In EPA's opinion, these results point overwhelmingly to the need for some type of corrective action at this SWMU.

Docket Number 450828

Internet Address (URL) • <http://www.epa.gov>

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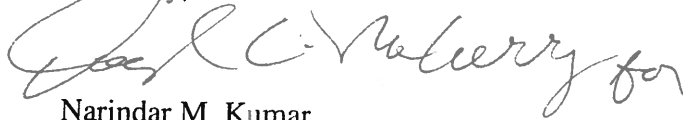
Because of the potential for migration of the Chromium +6 into the groundwater below the former Chrome Plating Line Area, additional ground water sampling for total Chromium, Chromium +6 and pH will be required as part of ongoing monitoring once the unit is closed. Post-closure groundwater monitoring for total Chromium, Chromium+6 and pH will be required at MW-23 and MW-24, or other monitoring wells, as appropriate.

In its next Closure Plan for the former Chrome Plating Area the facility must include remedial alternatives for source control of Chromium contamination. Remedial alternatives may include soil removal, contaminated debris removal, barriers, liners, chromium reductants, and/or other appropriate engineering controls, or combinations of these. Institutional Controls (IC) will still be required. EPA would consider using an order similar to a post-closure order to memorialize ICs, but will consider an easement depending on its survivability and enforceability.

In another ongoing investigation, indoor air in the Main Plant Building is being tested for eleven potential indoor air contaminants; these may be added to the requirements for any monitoring wells in or near the Main Plant Building. The facility should take into consideration, in its closure plan for the former Chrome Plating Area, that the soil in the area may be contaminated with TCE and Toluene vapors which could potentially affect removal activities or future indoor air inside the Main Plant Building.

If you have any questions or concerns regarding this letter, please contact Mr. Don Webster, your EPA Project Manager, at (404) 563-8469.

Sincerely,

A handwritten signature in dark ink, appearing to read "Narindar M. Kumar", with a stylized flourish at the end.

Narindar M. Kumar,
Chief, RCRA Programs Branch

cc: Louis Crawford, MDEQ
Dave McCabe, Textron Automotive
John Bozick, Arvin Meritor Automotive

Donald Webster

To: dwilliams@grenadamfg.com

09/26/02 04:54 PM

cc: Doug McCurry/R4/USEPA/US@EPA, Lael Butler/R4/USEPA/US@EPA,
Russ Mclean/R4/USEPA/US@EPA

Subject: Closure NOTI Letter Grenada Manufacturing

Mr. Don Williams;

After our phone call today with Brian Soucy, Grenada's geotechnical consultant, I met with Russ McLean and Lael Butler regarding your situation (Russ is the Mississippi coordinator here and one of our most experienced corrective action specialists). We decided that it was not necessary to require TCLP testing as part of a HSWA Cleanup where we are using PRGs as guidelines for cleanup. Since electroplating waste is a listed waste, Grenada will be required by the State's RCRA program to dispose of it properly, therefore TCLP testing may not be necessary. Please be cognizant of EPA and the State's LDR Requirements and Contaminated Media Policy when you begin excavating and disposing of waste.

I am expecting your request to delay the closure plan until you can re-develop and resample MW-23 and MW-24 for Chromium +6, Total Chromium, pH etc. I would like you to conduct more than one sampling event. Monthly for the next three months may be appropriate. Russ and Lael suggested that you look also at the correlation of detected chromium levels in wells with rainfall events. I will allow you 120 days to submit the revised closure plan so that you may obtain the results of resampling monthly for 90 days. The NOTI letter has been revised and will be sent to you early next week.

Please contact me immediately if you have any questions or concerns regarding this message.

Sincerely, Don Webster